

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

ELIJAH CALVIN XAIVER LOATMAN,
a/k/a "Nephew the Genius,"
a/k/a "The Art of War,"

and

KEVIN NATHANIEL JACKSON,
a/k/a "4B1,"

Defendants.

Criminal No. 1:24-cr-105

Count 1:
Conspiracy
(18 U.S.C. § 371)

INDICTMENT

May 2024 Term – at Alexandria

THE GRAND JURY CHARGES THAT:

At all times relevant to this Indictment:

GENERAL ALLEGATIONS

A. Animal Fighting Ventures and Dogfighting

1. The federal Animal Welfare Act defines "animal fighting venture" as "any event, in or affecting interstate or foreign commerce, that involves a fight conducted or to be conducted between at least two animals for purposes of sport, wagering, or entertainment." It is illegal to sponsor or exhibit an animal in an animal fighting venture. It is also illegal to possess, train, sell, buy, transport, deliver or receive an animal for purposes of having the animal participate in an animal fighting venture.

2. In the United States, dogfighting ventures almost always involve “pit bull”-type dogs, which dogfighters prefer for their compact muscular build, short coat, and the aggression that some display toward other dogs. Generally, a dogfight occurs when two dogs are released by their handlers in a controlled environment to attack each other and fight. The fight ends when one dog withdraws, when a handler “picks up” their dog and forfeits the match, or when one or both dogs die.

3. Because of their conditioning and training, dogs used in animal fighting ventures are almost always housed separately from other dogs—in pens, cages, or on chains—so that they will not hurt or kill other dogs when the handler is absent. Heavy chains are often used when restraining dogs used for fighting purposes to develop neck strength.

4. Generally, dogfighters select the strongest, most capable fighting dogs and selectively breed, sell, and fight only those dogs that display particular traits. Some of these traits are: (1) “gameness” or aggressiveness and propensity to fight other dogs; (2) a willingness to continue fighting another dog despite traumatic and/or mortal injury; and (3) cardiovascular endurance to continue fighting for long periods of time and through fatigue and injury. Dogs displaying these attributes are often bred with other dogs displaying similar traits to enhance the bloodline of these dogs for fighting purposes. Dogfighters generally keep such dogs solely for fighting purposes.

5. Dogs who have been fought may have scars, puncture wounds, swollen faces, or mangled ears. Scars from organized dogfights are commonly found on the face and front legs, as well as on hind ends and thighs.

6. Dogs that lose fights or fail to show “gameness” are often killed. It is not uncommon for dogs that lose matches to be killed in cruel, torturous, and inhumane ways as punishment.

7. Once a dogfighter locates an opponent and agrees upon terms, the match is “hooked,” or set up. The dog then typically undergoes a conditioning process dog handlers refer to as a “keep.” A “keep” is typically conducted for six to eight weeks before the scheduled match and involves a training program including treadmills used to run and exercise the dogs away from public view; weight pulls used to increase the dog’s strength and stamina; devices such as “spring poles” and “flirt poles” to build jaw strength and increase aggression; and the administration of drugs, vitamins, and other medicine. Some of the drugs used include steroids to build muscle mass and aggression. Dogs matched for future fights are expected to achieve their established target weight by the scheduled match, much like in human boxing matches, requiring close attention to a dog’s routine. Training can take place at a dogfighter’s “yard” or indoors away from public view.

8. Generally, dogfighters fight dogs with a goal of obtaining “Champion” or “Grand Champion” status for their dogs, which is achieved by winning three or five fights, respectively. Individuals who own fighting dogs often try to maintain records of their dogs’ success in fighting, at least partly because the offspring of fighting dogs can be sold at higher prices based on the documented success of the parents. One website on which dogfighters post pedigrees to demonstrate the fighting lineage of their dogs is <https://www.apbt.online-pedigrees.com/>. On this site, pedigrees are searchable by a variety of parameters and are routinely marked with codes to signify dogs’ fighting results, such as “1XW,” “2XW,” “CH.,” and “GR. CH.,” which signify a one-time dog-fight winner, a two-time dog-fight winner, a champion, and a grand champion, respectively. “OTC” refers to fights that were conducted “off-the-chain”—that is to say, a less

formal fight, conducted without the prior preparation of a “keep.” “GIS” refers to an award for the most “game” dog in a particular card of dogfights.

B. The DMV Board

9. It can be challenging for dogfighters to find an opponent with a dog of the same weight and sex who is looking to fight that dog at the same time of year, and for a wager that is mutually agreeable to both parties. For that reason, dogfighters rely heavily on each other and on extensive networks of contacts to find an opponent. The practice is known as “calling out a weight.” Dogfighters often “call out a weight” to known dogfighters in several states to increase their odds of finding a match. “Calling out a weight” is often done over the internet, which is an instrumentality of interstate commerce.

10. Telegram is a multi-platform messaging application that can be downloaded on to iOS and Android devices.

11. To maintain contact with each other to discuss dogfighting, to exchange videos about dogfighting, and to arrange dogfights away from the view of law enforcement, the defendants and their conspirators created private groups on Telegram that they collectively referred to as the “DMV Board” or the “Board” (hereinafter, the “DMV Board”). The “DMV” designation referred to the common location of many members of the group in the District of Columbia, Maryland, and Virginia. The DMV Board had as many as 28 members at one time, and its members used the DMV Board to communicate about dogfighting with each other daily, often throughout the day.

12. The following defendants (whose names will hereinafter appear in bold font and capital letters) and conspirators were members of the DMV Board:

Name	Alias(es)	Hereinafter
Bashawn Allen	Bey, 425 Moneyboy\$	Allen
Larry Alston	Big Goon, Tha Goons	Alston
Charles Davis, Jr.	Cat Daddy, Deep in the Game	Davis
Carlos Harvey	Roc9	Harvey
Eldridge Jermaine Jackson	Big Head, 4bhead	Eldridge Jackson
Kevin Nathaniel Jackson	4B1	KEVIN JACKSON
Elijah Calvin Xaiver Loatman	Nephew the Genius, The Art of War	LOATMAN
Rodriguez Norman	Tough Love	Norman
Dandre Patrick Wallace	Abstract	Wallace
Isaac Weathersby	Big Fist	Weathersby
Charles Williams, III	Chucky, Never Say Never	Williams
Tarry Wilson	TJ, City Limits	Wilson

COUNT ONE
(*Dogfighting Conspiracy*)

1. The general allegations of this Indictment are realleged and incorporated into this count as though fully set forth herein.

2. From in and around October 2018 and continuing through in and around November 2022, in the Eastern District of Virginia and elsewhere, the defendants, **KEVIN NATHANIEL JACKSON**, a/k/a “**4B1**,” of Hague, Virginia, and **ELIJAH CALVIN XAIVER LOATMAN**, a/k/a “**Nephew the Genius**” and “**The Art of War**,” of Newark, Delaware, did knowingly and unlawfully combine, conspire, confederate, and agree with one another and others, both known and unknown to the Grand Jury, to commit the following offenses:

- a. to sponsor and exhibit dogs in animal fighting ventures, in violation of Title 7, United States Code, Section 2156(a)(1), and Title 18, United States Code, Section 49(a);

- b. to sell, buy, possess, train, transport, deliver, and receive dogs for purposes of having the dogs participate in animal fighting ventures, in violation of Title 7, United States Code, Section 2156(b), and Title 18, United States Code, Section 49(a); and
- c. to use instrumentalities of interstate commerce for commercial speech for purposes of advertising animals for use in animal fighting ventures, promoting and in other manners furthering animal fighting ventures, in violation of Title 7, United States Code, Section 2156(c), and Title 18, United States Code, Section 49(a).

Ways, Manner, and Means of the Conspiracy

The manner and means by which the defendants and their conspirators sought to accomplish the objects of the conspiracy included, among others, the following:

- 1. It was a part of the conspiracy that the defendants and their conspirators bred, trained, and used pit bull-type dogs for dogfights.
- 2. It was a further part of the conspiracy that the defendants and their conspirators agreed to breed their pit bull-type dogs to one another's pit bull-type dogs in the hopes of producing champion fighting dogs.
- 3. It was a further part of the conspiracy that the defendants and their conspirators traveled to dogfights held at properties owned and/or arranged by themselves or other conspirators.
- 4. It was a further part of the conspiracy that the defendants and their conspirators bet on dogfights in which were entered dogs bred, trained, or owned by the defendants and their conspirators.

5. It was a further part of the conspiracy that the defendants and their conspirators used cell phones and direct messages to discuss dogfights, dogfighting, breeding fighting dogs, training techniques to maximize their chances of developing champion fighting dogs, and methods to avoid being caught by law enforcement.

6. It was a further part of the conspiracy that the defendants and their conspirators posted the names, photos, and lineages of their fighting dogs on websites that tracked pedigrees of fighting dogs.

7. It was a further part of the conspiracy that the defendants and their conspirators created and used the DMV Board as a place where they and their associates could exchange videos about dogfighting; discuss training techniques to develop successful fighting dogs; and arrange, coordinate, watch, discuss, and bet on dogfights, all away from the view of law enforcement authorities.

8. It was a further part of the conspiracy that, on the DMV Board, the defendants and their conspirators used the names of their dogfighting operations and/or kennels to refer to themselves as well as to their dogfighting operations and/or kennels.

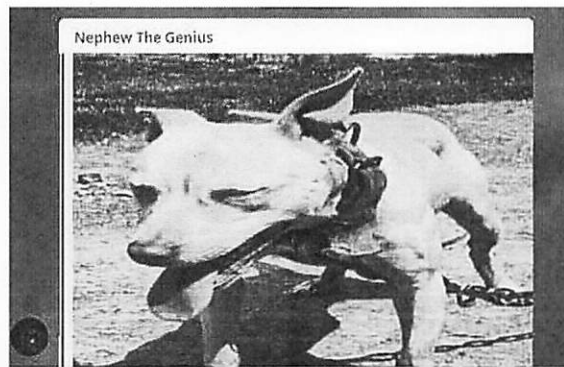
9. It was a further part of the conspiracy that the defendants and their conspirators used the DMV Board to discuss which dogfighters could be trusted to join the group, to circulate media reports about dogfighters who had been caught by law enforcement, and to discuss methods to minimize the likelihood that they would be caught themselves.

Overt Acts

In furtherance of the conspiracy, and to accomplish the objects of the conspiracy, the defendants and their conspirators committed overt acts including but not limited to the following:

1. On or about October 15, 2018, conspirator Eldridge Jackson, a/k/a “Big Head” and “4bhead,” added defendant **JACKSON, a/k/a “4B1”** to the latest version of the DMV Board on Telegram.

2. On or about October 17, 2018, defendant **LOATMAN, a/k/a “Nephew the Genius,”** posted to the DMV Board a photo of his pit bull dog training in preparation for a fight, along with the message “This the 33f I’m a smoke one of y’all with when I’m done teaching her”:

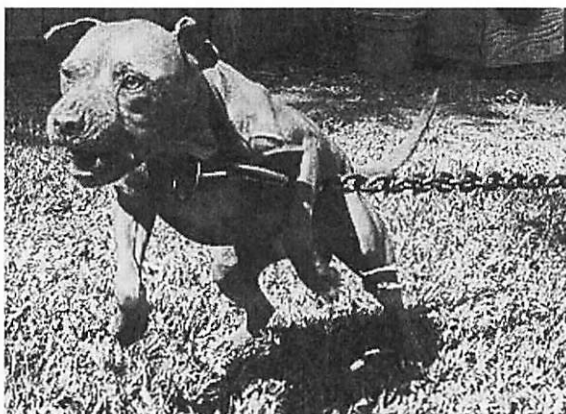


3. On or about October 17, 2018, on the DMV Board, defendant **LOATMAN, a/k/a “Nephew the Genius,”** negotiated the terms of a dog fight with conspirator “Gameline Kennelz.”

4. On or about October 26, 2018, defendant **LOATMAN, a/k/a “Nephew the Genius,”** notified the DMV Board that the descendant of one of his dogs from the “Art of War” kennel won a fight the previous night.

5. On or about October 26, 2018, defendant **LOATMAN, a/k/a “Nephew the Genius,”** posted to the DMV Board a link to a website tracking pedigrees of fighting dogs for information about his dog “Art of War’s Drama Queen,” and offered offspring of that dog for sale for \$750 each.

6. On or about November 3, 2018, defendant **LOATMAN, a/k/a “Nephew the Genius,”** asked the members of the DMV Board for their opinions about a fighting dog he had just purchased, whose information on a website tracking pedigrees of fighting dogs included this photo:



7. On or about November 3, 2018, defendant **LOATMAN, a/k/a “Nephew the Genius,”** solicited a fight for a 36-pound dog to occur in January 2019 for \$1,000 or \$2,000.

8. On or about November 4, 2018, defendant **LOATMAN, a/k/a “Nephew the Genius,”** agreed on the DMV Board to have his dog fight a dog belonging to conspirator Wilson, a/k/a “TJ” and “City Limits,” for a stake of \$2,000 and a forfeit fee of \$750.

9. On or about January 19, 2019, conspirator Wilson, a/k/a “TJ” and City Limits,” and other members of the DMV Board traveled from Warsaw, Virginia, to Delaware in order to attend a fight between a dog owned by Wilson and a dog owned by conspirator Weathersby, a/k/a “Big Fist.”

10. On or about January 19, 2019, after a dog owned by conspirator Weathersby, a/k/a “Big Fist,” defeated a dog owned by conspirator Wilson, a/k/a “TJ” and “City Limits,” in a fight in Delaware that lasted one hour and 12 minutes, Wilson attempted to electrocute his dog but, when that failed, shot her.

11. On or about January 29, 2019, conspirator Eldridge Jackson, a/k/a "Big Head" and "4bhead," added defendant **JACKSON, a/k/a "4B1,"** to the latest version of the DMV Board group on Telegram.

12. On or about February 9, 2019, defendant **JACKSON, a/k/a "4B1,"** discussed on the DMV Board a time that he and other members of his dogfighting group caused their dog known as "Justice" to fight three other dogs.

13. On or about February 9, 2019, conspirator Eldridge Jackson, a/k/a "Big Head" and "4bhead," said on the DMV Board that he and defendant **Jackson, a/k/a "4B1,"** purchased the fighting dog known as "Justice."

14. On or about February 9, 2019, defendant **LOATMAN, a/k/a "Nephew the Genius,"** asked on the DMV Board whether any of the members of the DMV Board did not like the chances of conspirator Wallace, a/k/a "Abstract," in a dogfight scheduled for that evening.

15. On or about February 10, 2019, defendant **LOATMAN, a/k/a "Nephew the Genius,"** congratulated on the DMV Board conspirator Wallace, a/k/a "Abstract," on his dog's victory in a fight that occurred the previous night.

16. On or about April 3, 2019, **LOATMAN, a/k/a "Nephew the Genius,"** texted conspirator Davis, a/k/a "Cat Daddy" and "Deep in the Game," that **LOATMAN's** dog was not ready to fight.

17. On or about May 26, 2019, after posting to the DMV Board a text message stating "When I get done with what I'm going through I'm, coming to smoke anybody coming at my man Abstract," defendant **LOATMAN, a/k/a "Nephew the Genius,"** told the DMV Board: "You all better recognize something. Abstract got a full bloody hitter on his team, Shorty. We coming. We coming, Shorty."

18. On or about May 29, 2019, defendant **JACKSON, a/k/a “4B1,”** described on the DMV Board a fight involving a dog belonging to conspirator Wallace, a/k/a “Abstract.”

19. In a text message on or about June 13, 2019, conspirator Davis, a/k/a “Cat Daddy” and “Deep in the Game,” invited dogfighter Harvey, a/k/a “Roc9,” to meet at a specific address in Woodbridge, Virginia, at 9:00 p.m. on June 15, 2019, to go from there to the site of a fight to take place that evening involving a dog owned by conspirator Wilson, a/k/a “TJ” and “City Limits,” but trained by conspirator Davis, a/k/a “Cat Daddy” and “Deep in the Game.”

20. At approximately 8:45 p.m. on June 15, 2019, conspirator Williams, a/k/a “Chucky” and “Never Say Never,” arrived at the address in Woodbridge, Virginia, that conspirator Davis, a/k/a “Cat Daddy” and “Deep in the Game,” had provided to dogfighter Harvey, a/k/a “Roc9,” two days earlier, and did not return to his residence in Maryland until approximately midnight.

21. On or about July 30, 2020, a conspirator posted to a website tracking pedigrees of fighting dogs information for the fighting dog “4B’s Justice,” owned in part by defendant **Jackson, a/k/a “4B1.”**

22. On or about July 26, 2020, the following photo of **JACKSON, a/k/a “4B1,”** and two fighting dogs, taken in the vicinity of Nomini Hall Road in Hague, Virginia, was posted on the DMV Board:



23. On or about July 27, 2019, defendant **LOATMAN, a/k/a “Nephew the Genius,”** posted to the DMV Board a text message stating, “I’m locking in with these 2 hounds I’m preparing to take out. It’s that time.”

24. On or about November 3, 2019, conspirator Wilson, a/k/a “TJ” and “City Limits,” kept as his property in Warsaw a fighting dog known as “Anne May” that belonged to conspirator Eldridge Jackson, a/k/a “Big Head” and “4bhead.”

25. On or about March 17, 2021, in the vicinity of the temporary residence of defendant **JACKSON, a/k/a “4B1,”** near Fisher Road in Temple Hills, Maryland, a conspirator chained a dog to a treadmill to train the dog for a fight, as depicted in following photo retained by **JACKSON:**



26. On or about August 12, 2020, conspirator Wilson, a/k/a “TJ” and “City Limits,” possessed at his residence in Warsaw fighting dogs and videos depicting him engaged in dogfighting with conspirators Eldridge Jackson, a/k/a “Big Head” and “4bhead,” Wallace, a/k/a “Abstract,” and Williams, a/k/a “Chucky” and “Never Say Never.”

27. On or about November 14, 2021, a conspirator posted to a website tracking pedigrees of fighting dogs information for the fighting dog “Goons Family’s Ms Brown 2X,” characterizing the dog as the offspring of “4B’s Lil Sinner” and “4B’s Justice,” fighting dogs owned in part by defendant JACKSON, a/k/a “4B1.”

28. On or about February 15, 2022, a conspirator posted to a website tracking pedigrees of fighting dogs information for the fighting dog "425 Money Boy\$ Ms. Brown," characterizing the dog as the offspring of "4B's Lil Sinner" and "4B's Justice," fighting dogs owned in part by defendant JACKSON, a/k/a "4B1."

29. On or about June 5, 2022, defendant JACKSON, a/k/a "4B1," asked conspirator Williams, a/k/a "Chucky" and "Never Say Never," whether conspirator Wallace, a/k/a "Abstract," still had a spot to host dogfights.

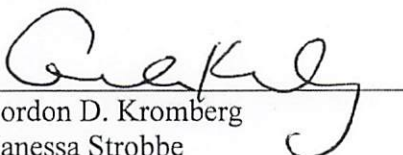
30. On or about November 23, 2022, defendant JACKSON, a/k/a "4B1," received a message showing information posted on a website tracking pedigrees of fighting dogs contending that two members of the DMV Board had acted as government informants in an investigation into the DMV Board's dogfighting activities.

(All in violation of Title 18, United States Code, Section 371.)

Pursuant to the E-Government Act,
A TRUE BILL: The original of this page has been filed
under seal in the Clerk's Office
FOREPERSON OF THE GRAND JURY

Jessica D. Aber
United States Attorney

By:


Gordon D. Kromberg
Vanessa Strobbe
Assistant United States Attorneys